

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

MILWAUKEE COUNTY, EMPLOYEE'S
RETIREMENT SYSTEM OF THE COUNTY
OF MILWAUKEE, and PENSION BOARD,
EMPLOYEE'S RETIREMENT SYSTEM OF
THE COUNTY OF MILWAUKEE,

Plaintiffs,

Case No. 06-CV-0372

v.

MERCER HUMAN RESOURCE
CONSULTING, INC.,

Defendant.

**DECLARATION OF VALERIE P. VIDAL IN SUPPORT OF
MERCER'S RESPONSES TO PLAINTIFFS' CONSOLIDATED MOTION *IN LIMINE***

I, Valerie P. Vidal, under penalty of perjury under the laws of the United States, and pursuant to 28 U.S.C. § 1746, declare that the following facts are true and correct:

1. I am an associate in the Milwaukee office of Quarles & Brady LLP, attorneys for the Defendant, Mercer Human Resource Consulting, Inc., nka Mercer (US) Inc. ("Mercer"). I have been involved in Mercer's defense in this matter from the commencement of this action. I make this declaration upon my personal knowledge.

2. Attached hereto are true and correct copies of the following exhibits:

- **Exhibit 1:** Amended Criminal Information, March 15, 2004, *State of Wisconsin v. Gary Dobbert*, Case No. 02-CF-2587.
- **Exhibit 2:** Excerpts from the Depositions of Gary Dobbert, August 8-9, 2007.

- **Exhibit 3:** Excerpts of Plaintiffs' Proposed Deposition Designations.
- **Exhibit 4:** Excerpts from the Deposition of Thomas Ament, August 15, 2007.
- **Exhibit 5:** Excerpts from the Depositions of Lynne DeBruin, June 7, 2007 and June 14, 2007.
- **Exhibit 6:** Excerpts from the Deposition of Jeremiah Hegarty in *Bilda* litigation, June 20, 2003.
- **Exhibit 7:** Excerpts from the Deposition of Mark Borkowski in *Bilda* litigation, August 7, 2003.
- **Exhibit 8:** Excerpts from the Deposition of Karen Ordinans, June 19, 2007.
- **Exhibit 9:** Excerpts from the Deposition of Derek Kenner in *Bilda* litigation, March 12, 2003.
- **Exhibit 10:** Excerpts from the Department of Justice Interview of Robert Krug, January 18, 2002.
- **Exhibit 11:** Excerpts from the Department of Justice Interview of Linda Ryan, April 4, 2002.
- **Exhibit 12:** Excerpts from the Department of Justice Interview of Joseph Davis, February 19, 2002.
- **Exhibit 13:** Excerpts from the Department of Justice Interview of Kathleen Arciszewski, February 28, 2002.
- **Exhibit 14:** Excerpts from the Department of Justice Interview of Robert Ott, February 5, 2002.
- **Exhibit 15:** Excerpts from the Department of Justice Interview of Gary Dobbert, February 5, 2002.
- **Exhibit 16:** Excerpts from the Department of Justice Interview of Jerome Heer, March 26, 2002.
- **Exhibit 17:** Audit of Milwaukee County's Development and Adoption of 2001-2004 Wage and Benefit Package, April 2002, Milwaukee County Department of Audit.

- **Exhibit 18:** Excerpts from Deposition of Kim Nicholl, January 10, 2008.
- **Exhibit 19:** Excerpts from the Expert Report of Kim Nicholl, September 6, 2007.
- **Exhibit 20:** Excerpts from the Transcript of Hearing on Scheduling/Motions to Compel before the Honorable Charles N. Clevert, United States District Judge, May 9, 2008.
- **Exhibit 21:** Excerpts from the Deposition of Jerome Heer, June 27, 2007.

Dated this 26th day of November, 2008.

s/ Valerie P. Vidal